

EXHIBIT P

From: [Robert MacGill](#)
To: [Allison Carter](#)
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Subject: Re: Hunt v. Southern Baptist Convention, et al.
Date: Tuesday, December 19, 2023 11:06:03 AM
Attachments: [image001.png](#)
[2023-11-28 MacGill PC Letter \(3\).pdf](#)

Counsel,

We are in receipt of the Guidepost letter unilaterally cancelling the scheduled meet and confer at 11 am central time today.

We will pursue a Court Order enforcing each of the depositions of GuidePost personnel as noticed in the enclosed letter.

We will seek agreements from the remaining defendants as to the dates we proposed in the enclosed letter.

We will contact the Magistrate Judge Frensey now to seek a conference to enforce the Guidepost deposition notices.

Best regards.

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P Please consider the environment before printing this email.

On Tue, Dec 19, 2023 at 11:42 AM Allison Carter <acarter@rjfirm.com> wrote:

Attached please find a letter from Kathy Klein. As explained in the letter, Guidepost is canceling today's call.



Allison Carter, Legal Assistant
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Via Email

November 28, 2023

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Matt C. Pietsch
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RE: *Hunt v. SBC, et al.* (M.D. Tenn.) (No. 3:23-cv-00243)

Dear Counsel:

We write on behalf of Plaintiff Johnny Hunt and in follow-up to my phone calls and voicemail regarding the scheduling of depositions.

Now that the Court has ruled on the pending motions and ordered that the documents at issue be produced, we are able to set a deposition schedule for testimony we are seeking in the case. Please see the schedule below with proposed dates for depositions. The corresponding notices are enclosed, and the 30(b)(6) notices will be provided soon.

- January 16, 2024: Samantha Kilpatrick and Russell Holske Jr. (Riley & Jacobson, PLC)
- January 17, 2024: Krista Tongring and Anthony Collura (Riley & Jacobson, PLC)
- January 18, 2024: Julie Myers Wood (Riley & Jacobson, PLC)
- January 19, 2024: Complainant and her husband (Florida)
- January 24, 2024: Ed Litton and John Batts (Riley & Jacobson, PLC)
- January 25, 2024: Chris Dupree and Nancy Spalding (Riley & Jacobson, PLC)
- January 26, 2024: Mike Keahbone (Riley & Jacobson, PLC)

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R. Brandon Bundren
L. Gino Marchetti, Jr.
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- January 29-30, 2024: 30(b)(6) Depositions of the Southern Baptist Convention and the Executive Committee (Riley & Jacobson, PLC)
- TBD: Bart Barber (Riley & Jacobson, PLC)

Please confirm each witness's availability on the dates listed above. We would like to confirm each of these depositions by December 8 to ensure we comply with the controlling case milestones.

As we discussed, we are working to provide dates for the depositions of Johnny Hunt and Janet Hunt. We will provide an update on available dates and locations for these depositions shortly. We appreciate your efforts and attention to these important scheduling issues.

Please let us know if you have any questions or concerns.

Best regards.

Very truly yours,



Robert D. MacGill